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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GAIL MANNEY,

Defendant.

Case No. 3:21-CR-00019-HDM-CSD
ORDER GRANTING

**STIPULATION TO EXTEND TIME
TO FILE RESPONSE TO MOTION
TO SUPPRESS EVIDENCE [ECF #32]**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by and through Jason M. Frierson, United States Attorney for the District of Nevada, Megan Rachow, Assistant United States Attorney, counsel for the United States of America, and Kate Berry, Assistant Federal Public Defender, counsel for Defendant Gail Manney, to extend the time in which the Government's Response to the Defendant's Motion to Suppress Evidence [ECF #32] is due from October 7, 2022, to October 11, 2022. Defendant's Replies to the Government's Response would then be due on October 18, 2022, however, the Government would not object if the defendant needed additional time to respond. This is the first request for an extension. Trial is currently set for November 7, 2022 although Defendant has filed a motion

for a brief trial continuance (ECF 35). Government counsel is respectfully requesting an additional four days to file its response due to government's counsel being out of the country from September 22, 2022 through October 2, 2022. As such, the parties are stipulating to a short extension of the Government's response date from October 7, 2022 until October 11, 2022. Additionally, the parties are stipulating that Defendant will have until October 18, 2022 to file her reply. The additional time requested for the filing the responses is requested mindful of the current trial date of November 7, 2022, the exercise of due diligence, in the interests of justice, and not for any purpose of delay.

DATED: October 5, 2022.

JASON M. FRIERSON
United States Attorney

RENE L. VALLADARES
Federal Public Defender

/s/ Megan Rachow
MEGAN RACHOW
Assistant United States Attorney

/s/ Kate Berry
KATE BERRY
Assistant Federal Public Defender
Counsel for Defendant

The parties' stipulation for extension of time is granted nunc pro tunc to October 7, 2022.

IT IS SO ORDERED.

DATED: This 11 day of October, 2022.

Howard D. McKibben
HON. HOWARD D. MCKIBBEN
UNITED STATES DISTRICT JUDGE